1 2 3 4 5 6	MICHAEL BEEDE, ESQ. Nevada Bar No. 13068 JAMES W. FOX, ESQ. Nevada Bar No. 13122 THE LAW OFFICE OF MIKE BEEDE, PLLC 2470 St. Rose Pkwy., Ste. 307 Henderson, NV 89074 Phone: 702-473-8406 eservice@legallv.com Attorneys for Plaintiff	
7 8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	MARIVELLE NUNEZ AS TRUSTEE FOR MARIVELLE NUNEZ REVOCABLE	CASE NO. 2:16-cv-01504-JAD-NJK
11	LIVING TRUST, Plaintiff,	STIPULATION AND ORDER TO
12	v.	EXTEND RESPONSE DEADLINE TO NATIONSTAR MORTGAGE, LLC's
14	HOMEFIELD FINANCIAL, INC.; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.;	MOTION FOR SUMMARY JUDGMENT [ECF NO. 42]
15	NATIONSTAR MORTGAGE, LLC; KEYBANK NATIONAL ASSOCIATION; and	[FIRST REQUEST]
16 17	DOES 1 through 10, inclusive; ROE CORPORATIONS 1 through 10, inclusive	
18	Defendants.	
19	NATIONSTAR MORTGAGE, LLC	
20	Counterclaimant/Crossclaimant, v.	
21	MARIVELLE NUNEZ AS TRUSTEE FOR MARIVELLE NUNEZ REVOCABLE	
22	LIVING TRUST; SILVER TURTLE	
23	HOMEOWNER'S ASSOCIATION; and NEVADA ASSOCIATION SERVICES	
24	Counter-Defendant/Cross-Defendants	
25		
26	Defendant/Counterclaimant/Cross-Claimant Nationstar Mortgage LLC (Nationstar) and	
27	Defendant Mortgage Electronic Registration Systems, Inc. (MERS, collectively Defendants) and	
28	Plaintiff/Counter-Defendant Marivelle Nunez as Trustee for Marivelle Nunez Revocable Living	

Trust (**Plaintiff**), by and through their respective counsel of record, stipulate to extend Plaintiff's deadline to respond to Defendant Nationstar Mortgage LLC's motion for summary judgment [ECF 42] for fourteen (14) days as follows:

- Plaintiff filed its complaint in the Eighth Judicial District Court of Clark County,
 Nevada on May 4, 2016 asserting quiet title/declaratory relief and injunction relief against
 Defendants.
- 2. Nationstar removed this action to the United States District Court, District of Nevada on June 24, 2016 [ECF No. 1].
- MERS & Nationstar answered Plaintiff's complaint on July 15, 2016 [ECF No. 4
 & 6].
- 4. This Court entered a discovery plan and scheduling order on May 23, 2019, setting a November 19, 2019 dispositive motions deadline [ECF No. 27]. An order granting the parties' stipulation for an extension of the November 19, 2019 deadline was entered on September 23, 2019, extending the dispositive motions deadline to February 3, 2020 [ECF No. 40].
- 5. The parties stipulate to extending the Plaintiff's deadline to Nationstar Mortgage LLC's motion for summary judgment [ECF 42] for fourteen (14) days, up to and including **March 9, 2020**, to allow time for the parties to continue settlement negotiations which, if finalized, will resolve all pending claims.
- 6. The parties are currently evaluating a settlement arrangement that is atypical of these types of cases, as the original homeowner purchased the property from the HOA foreclosure sale buyer and is plaintiff in this action against the loan servicer, Nationstar, thus necessitating considerations between a borrower and lender not at issue in other cases.

The parties do not file this stipulation with the intent to delay or bad faith. 1 7. 2 DATED this 25th day of February, 2020. 3 THE LAW OFFICE OF MIKE BEEDE, PLLC AKERMAN LLP 4 /s/ Donna M. Wittig /s/ Michael N. Beede MELANIE D. MORGAN, ESQ. MICHAEL N. BEEDE, ESQ. 5 Nevada Bar No. 8215 Nevada Bar No. 13068 DONNA M. WITTIG, ESQ. JAMES W. FOX, ESQ. 6 Nevada Bar No. 11015 Nevada Bar No. 13122 1635 Village Center Circle, Suite 200 2470 St. Rose Parkway, Suite 307 7 Henderson, Nevada 89074 Las Vegas, Nevada 89134 Attorneys for Defendants Nationstar Attorneys for Marivelle Nunez as Truste Mortgage LLC and Mortgage Electronic Marivelle Nunez Revocable Living Trust 8 Nationstar Attorneys for Marivelle Nunez as Trustee for 9 Registration Systems, Inc. 10 IT IS SO ORDERED. 11 12 13 14 UNITED STATES DISTRICT JUDGE Dated: February 25, 2020. 15 16 17 18 19 20 21 22 23 24 25 26 27 28